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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
AT YAKIMA**

STATE OF WASHINGTON, et al.,

NO. 1:20-cv-03127-SAB

**Plaintiffs,**

V.

DECLARATION OF KRISTIN  
BENESKI IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
EXPEDITED DISCOVERY

DONALD J. TRUMP, in his official capacity as President of the United States of America; UNITED STATES OF AMERICA; LOUIS DEJOY, in his official capacity as Postmaster General; UNITED STATES POSTAL SERVICE.

## Defendants

1 I, Kristin Beneski, declare as follows:

2       1. I am an Assistant Attorney General with the Complex Litigation  
3 Division of the Washington Attorney General's Office and counsel of record for  
4 Plaintiff the State of Washington in this matter. I am over the age of 18, have  
5 personal knowledge of the matters herein, and am competent to testify thereto. I  
6 make this declaration in support of Plaintiffs' Motion for Expedited Discovery  
7 filed herewith.

8       2. As of the signing of this declaration, counsel for Defendants has not  
9 entered an appearance in this case.

10      3. On August 21, 2020, at approximately 12:33 p.m. Pacific Time,  
11 Solicitor General Noah G. Purcell sent an email (on which I was cc'd) to  
12 U.S. Attorney for the Eastern District of Washington William D. Hyslop advising  
13 that Plaintiffs intended to file a motion for expedited discovery in this matter and  
14 wished to confer with counsel for the United States Defendants. Immediately  
15 after sending the email, Solicitor General Purcell called and left a voicemail for  
16 Mr. Hyslop. As of 4:30 p.m. on August 21, we had not received a response from  
17 Mr. Hyslop.

18       I declare under penalty of perjury under the laws of the United States and  
19 the State of Washington that the foregoing is true and correct to the best of my  
20 knowledge.

1 SIGNED this 21st day of August, 2020, at Seattle, Washington.  
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*/s/ Kristin Beneski*  
KRISTIN BENESKI

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 21, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice.

I hereby certify that I have caused to be mailed by United States Postal Service the document to the following non-CM/ECF participants: (1) Donald J. Trump, in his official capacity as President of the United States of America, (2) United States of America; (3) Louis DeJoy, in his official capacity as Postmaster General; and (4) United States Postal Service. The document will also be sent by email to William D. Hyslop, U.S. Attorney for the Eastern District of Washington, at [bill.hyslop@usdoj.gov](mailto:bill.hyslop@usdoj.gov).

DATED this 21st day of August, 2020, at Tumwater, Washington.

/s/Jennifer D. Williams  
Jennifer D. Williams, Paralegal